

Federal Communications Commission
Consumer Information Bureau, Disabilities Rights Office
445 12th Street, SW
Washington, DC 20554

Dear FCC,

Thank you for this opportunity to submit Reply Comments on Digital Wireless Phones.

On September 28, 2000, I did submit Comments as per your notice.

My Comments today are in reply those submitted by Verizon Wireless and by The Cellular Telecommunications and Internet Association ("CTIA").

I must reiterate that I require digital wireless phones to properly participate in the current structure of my business, social, and personal world. However, I am forced to use an analog wireless phone which denies me digital's benefits and necessitates a more expensive analog service plan. And with this plan, I receive poor quality of service; i.e., a lack of service options which are available to digital service plans.

In my opinion, this is discriminatory. It does not provide me equal access to telecommunication services.

I do not agree with the industry request that digital wireless telephones should continue to be exempt from being compatible with hearing aids.

This exemption has been in effect for nearly five years, without any real attempt by the industry to develop compatibility with hearing aids.

For nearly five years my local telephone service provider has been placing a notice on my phone bill stating that federal law requires them to provide service for deaf and hard of hearing people through digital wireless systems, but they cannot do this as yet. However, my local phone service provider tells me research is being done to make digital phones more compatible.

I wonder what are the results of five years of research.

Reading comments of the CTIA gives a clue as to why progress is missing. Surely it is disingenuous for CTIA in their comments to make statements such as:

-----" It is premature "

-----" This process has been technically challenging "

-----" Participants have remained steadfast in their efforts to resolve the EMC issue and provide the benefits of digital wireless telecommunications to all consumers, including consumers with hearing impairments."

I would point out in this period of time spaceships have been designed, built, launched and returned--manned by astronauts from a cross section of nations. And I am sure there is agreement compatibility of hearing

aids with digital devices is not 'rocket science.'

What is missing is follow through, genuine commitment, matching research talent and dollars with verbal pronouncements.

It is my hope CTIA members would recognize the very important points made in a letter sent on September 21, 2000, to President Clinton by 46 CEOs of a number of American leading high-tech companies. I will quote briefly from the letter. (This letter in its entirety is available on the FCC-DRO web site, for which I thank the FCC.)

Dear Mr. President:

As the CEOs of a number of America's leading high-tech companies, we strongly support your efforts to promote the accessibility of information and communications products and services for people with disabilities.

We believe that there are two compelling reasons to do so. First, accessible information technology can be a powerful tool for expanding opportunity in the emerging information society. If our products and services are designed to be accessible, people with disabilities will find it easier to work, access a growing universe of electronic information and services, and lead more independent lives. If we fail to do this, people with disabilities could be further isolated from the mainstream of our economy and our society. Second, there are sound economic and commercial incentives to make our products more accessible. Globally, there are over 750 million people with disabilities, and there are 54 million in the United States alone. Making our products more accessible will also make it easier to serve the rapidly growing population of seniors.

Designing products and services that can give customers a choice of input and output mechanisms will help people with disabilities, but it will also help the mobile professional trying to access the Web on a handheld wireless device.

We will;

- * Involve people with disabilities in the development of our accessibility guidelines, or in the design and testing of our products and services;

- * Devote sufficient product development and engineering resources to identify and rapidly address known accessibility problems, in future products and upgrades;

- * Support internal and external (e.g. university based) research and development that will improve the state-of-the-art of accessible technology that is relevant to our products and services;

Sincerely,

I would also like to refer to and agree with Comments submitted on September 30, 2000 by a consumer Mr. George DeVilbliss. Mr. DeVilbliss's comments are available on the FCC- DRO web page.

His Comments make the point that the magnetic interference to T-Switch users can be solved and hearing aid users can use digital cellular phones.

In conclusion after five years of waiting, I am requesting that the Commission revoke the exemption for wireless telephones from the Hearing Aid Compatibility Act. Since it can be determined by doing so the interests of the public both hearing and hearing impaired will benefit greatly. Reference is made to the September 21, 2000, letter by 46 CEOs of America's leading high-tech companies.

Also, Mr. DeVilbliss's Comments made the point that compatibility between hearing aids and digital wireless phones is (1) achievable and (2) without a significant increase in cost.

Thank you,

Sincerely,

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